

Julian Omid  
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 P.O. Box 24947  
 Los Angeles, CA 90024  
*Counterclaim-Defendants*

**UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA**

Almont Ambulatory Surgery Center, LLC, et  
 al.,

Plaintiffs,

v.

Unitedhealth Group, Inc., et al.,

Defendants.

Case No. 14-CV-03053-MWF (VBKx)

**COUNTERCLAIM DEFENDANT  
 JULIAN AND MICHAEL OMIDI'S  
 OPPOSITION TO AND REQUEST  
 FOR IN CAMERA HEARING  
 REGARDING SHEPPARD  
 MULLIN RICHTER & HAMPTON  
 LLP'S MOTION TO WITHDRAW  
 AS COUNSEL FOR  
 COUNTERCLAIM DEFENDANTS  
 MICHAEL AND JULIAN OMIDI**

DATE: Oct. 19, 2015  
 TIME: 10:00 a.m.  
 DEPT.: Courtroom 16

United Healthcare Services, Inc., et al.,

Counterclaim Plaintiffs,

v.

Almont Ambulatory Surgery Center, LLC, et  
 al.,

Counterclaim Defendants.

*(Superior Court of the State of  
 California, County of Los Angeles,  
 Central District Case Number:  
 BC540056)*

Complaint filed: March 21, 2014

**COUNTERCLAIM DEFENDANT'S OPPOSITION TO AND REQUEST FOR *IN*  
CAMERA HEARING REGARDING SHEPPARD MULLIN RICHTER &  
HAMPTON LLP'S MOTION TO WITHDRAW**

Counterclaim Defendants Julian and Michael Omid ("Counterclaim Defendants") hereby oppose Sheppard, Mullin, Richter & Hampton LLP ("Sheppard Mullin") motion to withdraw as counsel. Sheppard Mullin has been advising Counterclaim Defendants for years.

Allowing Sheppard Mullin to withdraw will be severally prejudicial to Counterclaim Defendants. Counterclaim Defendants cannot further discuss this matter in public because it will reveal attorney-client privileged information.

For this reason, Counterclaim Defendants request an *in camera* hearing to discuss this matter and preserve the attorney client privilege. Counterclaim Defendants would also like to discuss the claims and assertions made by Sheppard Mullin in its motion.

*Respectfully Submitted,*

Dated: September 28, 2015

  
 Julian Omid

Dated: September 28, 2015

  
 Michael Omid

**PROOF OF SERVICE**

I am employed and a resident of the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 6380 Wilshire Boulevard, Suite 820, Los Angeles, California, 90048.

On September 28, 2015, I served the document described as:

**COUNTERCLAIM DEFENDANT JULIAN AND MICHAEL OMIDI'S  
OPPOSITION TO AND REQUEST FOR IN CAMERA HEARING REGARDING  
SHEPPARD MULLIN RICHTER & HAMPTON LLP'S MOTION TO  
WITHDRAW AS COUNSEL FOR COUNTERCLAIM DEFENDANTS MICHAEL  
AND JULIAN OMIDI**

Upon the interested parties in this action in a sealed envelope addressed as follows:  
**SEE ATTACHED SERVICE LIST**

  X   (By Mail) I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after day of deposit for mailing contained in affidavit.

       (By Facsimile Transmission) I caused the foregoing document to be served by facsimile transmission to each of the interested parties at the facsimile machine telecopy number shown in the service list attached hereto.

       (By Electronic Mail) I caused the foregoing document to be served in ".pdf format" from my electronic mail address, without error, situated and transmitted on this office's server for the web address www.yahoo.com to each of the interested parties at the email address shown in the service list attached hereto.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on this 28th day of September, 2015, at Los Angeles, California.

/s/ James Fleming

James Fleming



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